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19 Attorneys for Plaintiff and the Putative Class

20
21 UNITED STATES DISTRICT COURT
22
23 NORTHERN DISTRICT OF CALIFORNIA
24
25 SAN FRANCISCO DIVISION

26 DAPHNE P. RAND, by and through DEBRA
27 J. DOLCH, as Conservator of the Person and
28 Estate of DAPHNE P. RAND, Conservatee, on
Behalf of Themselves and All Others Similarly
Situated.

29 Plaintiff,

30 vs.

31 AMERICAN NATIONAL INSURANCE
32 COMPANY, a Texas corporation.

33 Defendant.

34 Case No. CV 09 0639 SI

35 CLASS ACTION

36 **STIPULATION AND [PROPOSED]
37 ORDER TO VACATE 5/20/11 CASE
38 MANAGEMENT CONFERENCE AND
39 TO SET THE MOTION FOR
40 PRELIMINARY APPROVAL HEARING**

41 Judge Susan Illston

42 Action Filed: 02/12/09

43 This Stipulation To Vacate the Case Management Conference and To Set the Motion for
44 Preliminary Approval Hearing is submitted jointly by Plaintiff DEBRA J. DOLCH, as Special
45 Administrator of the Estate of DAPHNE P. RAND (“Plaintiff”) and Defendant American National
46 Insurance Company (“ANICO” or “Defendant”), by and through their respective counsel of
47 records. The parties are close to finalizing a stipulation of settlement and all corresponding

1 exhibits. The parties anticipate that the Stipulation of Settlement and Exhibits will be submitted
2 for filing to the Court with the Motion for Preliminary Approval the week of May 23rd.
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4 The parties stipulate to vacating or continuing the Case Management Conference currently
5 set for May 20, 2011 at 3:00 p.m. and request that the Motion for Preliminary Approval Hearing
6 be set for June 10, 2011 at 9:00 a.m., or other date convenient to the court. The parties are also
7 amenable to continuing the Case Management Conference date to June 10, 2011 to be held in
8 conjunction with the Motion for Preliminary Approval Hearing.
9

10 DATED: May 12, 2011 THE EVANS LAW FIRM
11

12 By: _____ /s/
13 INGRID M. EVANS
14 Attorneys for Plaintiff DEBRA J. DOLCH, as Special
15 Administrator of the Estate of DAPHNE P. RAND
16

17 DATED: May 12, 2011 GREER, HERZ & ADAMS, LLP
18

19 By: _____ /s/
20 JOSEPH R. RUSSO
21 Attorneys for Defendant AMERICAN NATIONAL
22 INSURANCE COMPANY
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ATTESTATION OF SIGNATURE

Pursuant to General Order No. 45, § X(b), I hereby attest under penalty of perjury that concurrence in the filing of the document has been obtained from all signatories.

THE EVANS LAW FIRM

DATED: May 12, 2011

By: /s/
INGRID M. EVANS

IT IS SO ORDERED.

DATED: 5/18/11

By Susan Illston
The Honorable Susan Illston
District Court Judge